

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF AMERICAN BANKERS ASSOCIATION
(ABA/USPS-T32-3)**

The United States Postal Service hereby files its response to the following
interrogatory of American Bankers Association, filed August 18, 1997:
ABA/USPS-T32-3.

The interrogatory is stated verbatim and is followed by the response.

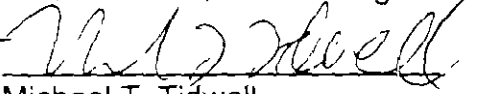
The interrogatory has been redirected from witness Fronk to the Postal Service
for response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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September 2, 1997

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES
OF THE AMERICAN BANKERS ASSOCIATION (ABA)
REDIRECTED FROM WITNESS FRONK

ABA/USPS-T32-3. On page 20 of your testimony, lines 16-22, you discuss the rationale for using bulk metered mail as a benchmark for worksharing discounts in First Class. Please provide annual historical data from 1975 through 1996 on the volume of bulk metered mail.


RESPONSE: No data are available which separate bulk metered letters that paid the single-piece rate from nonbulk metered letters that paid the single-piece rate. Available data which include both bulk and nonbulk metered letters are presented below. Postal Service data for metered letters which paid the single-piece (or nonpresort) rate are not available prior to Postal Quarter 2 of 1992. In addition, the percentage data below are from ODIS. These percentages were then applied to total number of nonpresort letters by year from Table 3 of witness Fronk's testimony (USPS-T-32).

	<u>% of Nonpresort that is Metered</u>	<u>Number of Nonpresort Metered Letters (millions)</u>
FY 1992	42.86%*	23,557
FY 1993	42.79	23,622
FY 1994	42.71	23,515
FY 1995	40.69	22,351
FY 1996	41.40	22,419

* Percentage based on Postal Quarters 2-4 only.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Michael T. Tidwell

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September 2, 1997